

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Karleen Ann RAMOS,

Defendant.

08 MJ 1960

Magistrate Case No. 1126 MJ 10:25

COMPLAINT FOR VIOLATION OF

Title 8, U.S.C., Section 1324(a)(2)(B)(iii)
Bringing in Illegal Alien(s)
Without Presentation

Title 18, U.S.C., Section 1544
Misuse of Passport

The undersigned complainant being duly sworn states:

Count I

On or about **June 24, 2008**, within the Southern District of California, defendant **Karleen Ann RAMOS**, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that aliens, namely, **Valentin HERNANDEZ-Perez, Josefina RODRIGUEZ-Martinez, and Arturo ANDRADE-Perez**, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said aliens, and upon arrival did not bring and present said aliens immediately to an appropriate immigration officer at a designated port of entry; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii).

Count II

On or about **June 24, 2008**, within the Southern District of California, defendant **Karleen Ann RAMOS**, did knowingly and willfully use a passport issued or designed for the use of another, with the intent to gain admission into the United States in the following manner, to wit: Defendant applied for entry to the United States by presenting U.S. Passport number 423012891, issued to Pamela Gail Hashey, to a Department of Homeland Security, Customs and Border Protection Officer, knowing full well that she was not Pamela Gail Hashey, that the passport was not issued or designed for her use; all in violation of Title 18, United States Code, Section 1544.

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

SIGNATURE OF COMPLAINANT
Sara Esparagoza, United States Customs
and Border Protection Enforcement Officer

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 26th DAY OF JUNE, 2008.

UNITED STATES MAGISTRATE JUDGE

PROBABLE CAUSE STATEMENT

The complainant states that **Valentin HERNANDEZ-Perez, Josefina RODRIGUEZ-Martinez, and Arturo ANDRADE-Perez** are citizens of a country other than the United States; that said aliens have admitted they are deportable; that their testimony is material; that it is impracticable to secure their attendance at trial by subpoenas; and that they are material witnesses in relation to this criminal charge and should be held or admitted to bail pursuant to Title 18, United States Code, Section 3144.

On June 24, 2008, at approximately 2152 hours, **Karleen Ann RAMOS (Defendant)**, made application for admission into the United States at the San Ysidro, California Port of Entry as the driver and sole visible occupant of a green 2003 GMC Envoy. Defendant presented a United States Passport bearing the name Pamela Gail Hashey to a Customs and Border Protection (CBP) Officer. The CBP Officer suspected the United States Passport was photo-altered and upon inspection of the vehicle, noticed several individuals attempting to elude inspection by concealment on the floor. The vehicle and its occupants were subsequently escorted to secondary for further inspection.

In secondary, five individuals were removed from the rear cargo area of the vehicle. The five individuals were determined to be citizens of Mexico without entitlements to enter the United States. Three of the five aliens were retained as Material Witnesses and are now identified as: **Valentin HERNANDEZ-Perez (MW1), Josefina RODRIGUEZ-Martinez (MW2), and Arturo ANDRADE-Perez (MW3).**

During a videotaped proceeding, Defendant was advised of her Miranda rights and elected to submit to questioning without the benefit of counsel. Defendant admitted knowledge of the concealed aliens in the rear area of the vehicle. Defendant admitted she was going to receive \$1,000.00 USD in exchange for driving and delivering the vehicle to an unknown location in the United States. Defendant admitted she presented a United States passport that was not lawfully issued to her.

On separate videotape interviews, Material Witnesses declared they are citizens of Mexico without legal rights to enter the United States. MW1 stated he was going to pay approximately \$3,800.00 USD to be smuggled into the United States and was traveling to Los Angeles, California to seek employment. MW2 stated her family made the arrangements and agreed to pay an unknown amount for her to be smuggled into the United States. MW2 stated she was traveling to Los Angeles, California. MW3 stated he was going to pay approximately \$5,000.00 USD to be smuggled into the United States and was traveling to San Jose, California to attend his daughter's birthday party.